

1 RENE L. VALLADARES  
Federal Public Defender  
2 MONIQUE KIRTLEY  
Assistant Federal Public Defender  
3 411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
4 (702) 388-6577/Phone  
(702) 388-6261/Fax  
5 Monique\_Kirtley@fd.org

6 Attorney for Isiah Brown  
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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12  
13 v.  
14 ISIAH BROWN,  
15 Defendant.

Case No. 2:16-cr-139-JCM-VCF  
2:15-cr-304-JAD-NJK

**JOINT MOTION TO CONSOLIDATE**  
(First Request)

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17 IT IS HEREBY AGREED, by and between Daniel G. Bogden, United States Attorney, and  
18 Crane M. Pomerantz, Assistant United States Attorney, counsel for the United States of America,  
19 and Rene L. Valladares, Federal Public Defender, and Monique Kirtley, Assistant Federal Public  
20 Defender, counsel for Isiah Brown to jointly move the Court to consolidate the above captioned  
21 cases under a single case number, preferably 2:16-cr-139-JCM-VCF.

22 This Joint Motion to Consolidate is entered into for the following reasons:

23 1. On February 17, 2016, the defendant was arrested and appeared in court pursuant  
24 to a two count criminal complaint, in case styled 2:16-cr-139-JCM-VCF, alleging Possession of  
25 a Controlled Substance with Intent to Distribute (Cocaine)(Count One) and Felon in Possession  
26 of a Firearm (Count Two). A criminal indictment was filed on May, 11, 2016 and the defendant  
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1 appeared on May 18, 2016. Calendar Call is scheduled for August 17, 2016. Trial is scheduled  
2 for August 22, 2016.

3 2. On February 18, 2016, the defendant had an initial appearance on a revocation of  
4 supervised release petition, in case styled 2:15- cr-304-JAD-NJK. The revocation petition  
5 alleged the same conduct as the criminal indictment. The Revocation of Supervised Release  
6 hearing is scheduled for August 15, 2016.

7 3. The parties have negotiated a global resolution in case 2:16-cr-139-JCM-VCF and  
8 in the revocation petition 2:15-cr-304-JAD-NJK. Because the indictment and revocation petition  
9 are inextricably linked they should be consolidated. Additionally, the interests of judicial  
10 economy and efficiency would be served by joining the matters.

11 DATED this 1<sup>st</sup> day of August, 2016.

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13 RENE L. VALLADARES  
14 Federal Public Defender

DANIEL G. BOGDEN  
United States Attorney

15 */s/ Monique Kirtley*  
16 By \_\_\_\_\_  
17 MONIQUE KIRTLEY  
Assistant Federal Public Defender

*/s/ Brandon Jaroch for*  
By \_\_\_\_\_  
CRANE M. POMERANTZ  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

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8

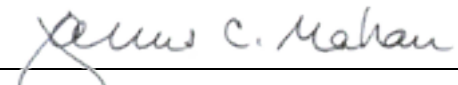
Case No. 2:16-cr-139-JCM-VCF  
2:15-cr-304-JAD-NJK

PROPOSED ORDER

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10 ORDER

11 IT IS ORDERED that the two cases 2:16-cr-139-JCM-VCF and 2:15-cr-304-JAD-NJK be  
12 consolidated and combined before the honorable Judge James C. Mahan.  
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14 DATED August 31, 2016.

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UNITES STATES DISTRICT JUDGE  
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